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Junod, Rebecca

From: Lawyer, Dennis
Sent: Tuesday, August 11, 2015 2:05 PM
To: kimberly.d.alston.mil@mail.mil
Subject: Uniformed Services University of the Health Sciences, Request for Additional Information Concerning Application for a License Renewal, Control 588409

Dear Major Alston,

This is in reference to your application dated July 20, 2015, requesting for license renewal to Nuclear Regulatory Commission License No. 19-23344-01, Docket No. 03020775. In order to continue our review, we need the following additional information:

1. Your application stated that that your mailing zip code changed to 20814-4799, yet your letter head states the zip code is 20814-4712.. Please confirm this change.
2. Your application associated with increased flexibility for the Radiation Safety Committee to make changes to the Radiation Safety Program or Procedures appears to be missing a description of documenting procedural changes as stated in NUREG-1556, Volume 11, "Consolidated Guidance About Materials Licenses, Program-Specific Guidance About Licenses of Broad Scope," section 8.7.2. Please provide a description of the documentation of the specific change. At a minimum, documentation shall state the reason for the change and summarize the radiation safety matters that were considered prior to approval of the change.
3. In your application, you state that you use an Application for Radionuclide Experimental Authorization and the Radiation Safety Guide in the review and approval of new users and uses of radioactive materials. In 10 CFR 33.13(3)(ii) it states that a completion of safety evaluations of proposed uses of byproduct material which take into consideration such matters as the adequacy of facilities and equipment. It appears that the application provides the information for the safety evaluation but it is not clear that it considers adequacy of facilities and equipment for the uses described. Please state that a safety evaluation will be performed that takes into consideration such matters as the adequacy of facilities and equipment, training and experience of the user, and the operating or handling procedures.
4. You provided many procedures for safe use of radionuclides and emergencies. There is a list of emergency procedures listed in Appendix R of NUREG-1556, Volume 11. It appears that you did not submit a procedure for fire, explosions, or major emergency. Please provide a procedure associated with these emergencies or state that you adopt the procedures for fire, explosions, or major emergency as written in Appendix R of NUREG-1556, Volume 11, "Program-Specific Guidance About Licenses of Broad Scope."
5. You submitted the information associated with your financial assurance that was submitted in 2013. 10 CFR 30.35(e)(2) states that the decommissioning funding plan must be submitted for review and approval at the time of license renewal. The decommissioning funding plan must be resubmitted with adjustments as necessary to account for changes in costs and the extent of contamination. Please submit the updated costs for the decommissioning funding plan, and the other necessary documents if needed to comply with 10 CFR 30.35(e)(1).

We will continue our review upon receipt of this information. Please reply to my attention at the Region 1 Office (Address below) and refer to Mail Control No. 588409. If you have technical questions regarding this letter, please call me at (610) 337-5366.

Please note that you may not reply to this letter by return e-mail. Your reply must be in writing by letter, facsimile (610-337-5269), or signed letter attached to an email. If we do not receive a reply from you within 30 calendar days from the date of this e-mail, we will assume that you do not wish to pursue your application.

Region 1 Office Mailing Address: Licensing Assistance Team, US Nuclear Regulatory Commission Region I, 2100 Renaissance Boulevard, Suite 100, King of Prussia, PA 19406-2713.

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